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## I. INTRODUCTION

In response to the Decision on Appeal mailed on September 15, 2006, claims 11, 23, 35, 41, 45, and 49 have been amended. Claims 1-10, 13-22, 25-34, 38-40, 42-44, and 46-48 have been withdrawn from consideration and claims 11-12, 23-24, 35-37, 41, 45, and 49 are currently pending. Re-consideration of the application, as amended is requested.

## II. SUMMARY OF CLAIMED SUBJECT MATTER

Independent claims 11, 23, and 35 are directed towards a PDA used to access geographic information (see page 8, lines 22-23). More specifically, an application on a PDA requests map data from a servlet (see FIG. 1; page 17, lines 11-15; page 18, lines 6-8; FIG. 3). The map data is then received by the PDA in the form of a mapset (see page 22, lines 1-5).

The claims specifically provide that the mapset contains map data for two (2) or more maps (see page 19, line 19-page 20, line 4). Further, the claims also specifically provide that the mapset was constructed prior to the servlet receiving the request from the PDA (see page 9, lines 10-18; page 18, lines 15-18; page 20, lines 5-13; FIG. 4; FIG. 5; page 21, lines 2-15; page 22, lines 3-5; page 23, lines 7-10; and page 24, lines 4-5). Once the mapset is received, the PDA formats and displays the mapdata from the mapset on a screen of the PDA (see page 16, lines 9-15; page 17, line 22-page 18, line 5; page 28, lines 5-7).

Applicants note that the claims have been amended such that the details of the mapset are now explicitly claimed. In this regard, the mapset now comprises an initial map, a set of two or more zoomed maps that can be zoomed to from the initial map, all maps that appears as links on the initial and zoomed maps, and map data for all of the maps in the mapset.

Applicants also note that the claims provide that the single mapset (which consists of all of the various maps) is constructed prior to receiving the request for map data from the PDA.

Dependent claims 12, 24, and 36 provide that the request from the PDA to the servlet is a "GET" HTTP request (see page 21, line 16-page 22, line 5). As known in the art and set forth in the specification, such a GET request retrieves whatever information is identified by a request that specifies a uniform resource identifier (URI).

Dependent claim 37 merely specifies that the article of manufacture set forth in independent claim 35 is a personal digital assistant.

Independent claims 41, 45, and 49 provide a system, method, and article of manufacture respectively for accessing geographic information (see page 8, lines 22-23). All of the claim sets are from the perspective of a personal digital assistant and not the server perspective with limitations similar to those set forth in independent claims 11, 23, and 35. Initially, map data is requested from a servlet (see FIG. 1; page 17, lines 11-15; page 18, lines 6-8; FIG. 3). The next step in all of the claims diverges from the steps set forth in independent claims 11, 23, and 35. In this regard, the claims specifically provide that the map data in a mapset was constructed in parallel on multiple processing units (see page 9, lines 4-9; page 11, lines 9-14; page 12, line 22; page 15, lines 14-17; page 20, lines 11-21; page 22, lines 3-5; page 23, lines 7-14; FIGS. 3, 4, and 5). The remaining steps format and display the data as in claims 11, 23, and 35 (see page 16, lines 9-15; page 17, line 22-page 18, line 5; page 28, lines 5-7).

### III. ARGUMENT

Applicants note that in the Decision on Appeal, the Board explicitly indicated several amendments that could be made. In this regard, on page 4, the Decision on Appeal provides:

The broadly defined map data 408 is said to be a mapset which in turn, to the extent not recited in independent claim 11 on appeal, is plural maps that appear as an initial map that can be zoomed or maps that appear as links on an initial or zoomed map. These latter requirements are not recited in any claim on appeal. Therefore, to the extent appellants invite us to read these features of the disclosed invention into the claims, we will not do so since appellants are free to amend the present claims on appeal to include such features.

Applicants have amended the independent claims to explicitly include such features. In addition, on page 3-4 of the Decision on Appeal, the Board indicated that the claims do not require that the mapset comprises two or more maps but merely require map data for two or more maps. Applicants have also amended the claims such that the single mapset now comprises at least two maps and also includes map data for all of the maps in the single mapset.

In view of the amendments and the direct indications in the Decision on Appeal relating to such amendments, Applicants submit that Bersitis fails to teach the invention as claimed. More specifically, Bersitis completely fails to teach, disclose, or suggest, implicitly or explicitly, numerous maps in a mapset, all of which have been placed into the single mapset prior to even receiving a

request for a map. Further, Berstis fails to teach, disclose, or suggest a single mapset that includes an initial map, a set of two or more zoomed maps, AND all maps that appear as links on the initial and zoomed maps. In this regard, the concept of linked maps is completely, entirely, and notoriously absent from Berstis. Even if one were to view Berstis' photographs as maps, the use of links on such maps is not taught or suggested in Berstis. However, the claims explicitly require such links and the inclusion of maps represented by such links in the single mapset (that is constructed prior to receiving a request)(and transmitted to the thin client). Further, Applicants note that Berstis does not describe or remotely allude to a single package that contains multiple such maps. Further, the ability to create such a package prior to receiving a request for the package and sending such a package in response to a request is also neither taught nor suggested in Berstis.

In view of the above, Applicants submit that Berstis completely fails to describe, teach, suggest, or allude to multiple aspects of the presently claimed invention.

In addition, the various elements of Applicants' claimed invention together provide operational advantages over the systems disclosed in Berstis. In addition, Applicants' invention solves problems not recognized by Berstis.

## IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

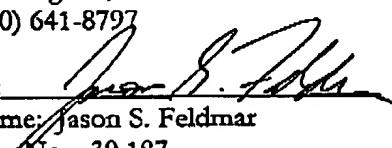
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